

RESPONSIVENESS SUMMARY

To EPA Comments on Proposed Title V Permit
During Official 45-Day EPA Review Period
(4/22/1999 - 6/6/1999)

for

Air Quality Control Permit # 1000102

Tucson Electric Power Company
Irvington Generating Station

The followings are responses to EPA's comments of June 3, 1999:

Comment 1: EPA believes that more specific requirements for baghouses should be added to the permits. For units equipped with baghouses, operation of these controls should be required (and explicitly stated in the permit) at all times when the units are in operation, in accordance with manufacturer's recommendation for use. In addition to these requirements, EPA recommends weekly inspections of operation and maintenance, including a test for tears and holes, and associated record keeping and reporting requirements.

Response: The language in Part II.A has been modified to indicate that the air pollution control has to be operated at all times during equipment use.

For the boiler baghouse, periodic monitoring for particulate matter consists of two parts. First the permittee is required to operate the baghouse in accordance with manufacturer's specifications. Second, the permittee is required to monitor opacity from the baghouse utilizing its Continuous Opacity Monitor (COM) to assure correct operation. Correct operation is determined by comparing COM output to a baseline opacity level that represents a proper operating baghouse. This approach is similar to what other states have utilized for periodic monitoring. ADEQ believes that this periodic monitoring is sufficient and no change to the permit has been made.

Comment 2: Conditions IV.A.1 and IV.C.1 in Attachment B (Specific Conditions) of the Irvington permit require an annual performance test for sulfur dioxide when liquid fuel is burned "on an annual basis". Since this phrase is not defined anywhere in the permit, these conditions are not practically enforceable. EPA recommends that the permits establish a specific number of operating hours or quantity of liquid fuel use that would trigger a source test.

Response: EPA's recommendation has been followed. 40 CFR 72.2 defines an oil-fired unit as one which uses fuel oil to provide 15% of its annual heat input. This definition has been borrowed for the purposes of establishing an operating hour threshold for the purposes of Conditions IV.A.1 and IV.C.1. Section VIII of the Technical Review document has been

modified to add the appropriate explanatory text.

Comment 3: The Irvington permit requires the certified Method 9 observer to report excess emissions when the six-minute opacity of the plume from the Coal Handling System exceeds 40% (Condition IV.F.1.c in Attachment B). EPA believes that the permit should also require the source to take corrective action in this scenario. This change should make the permit consistent with the Springerville permit, which requires the source to “adjust or repair the controls or the equipment to reduce opacity to below” the allowable level if the opacity reading exceeds that level.

Response: The suggested change has been made. The language is now consistent with the Springerville permit.

Comment 4: In order to clarify the sources’ obligation with respect to submitting semiannual compliance certifications, we suggest that standard condition VII.B in Attachment A (General Provisions) specify that copies of all compliance certifications be sent to EPA Region 9.

Response: The suggested change has been made.